

Title: Safeguarding and Prevent Policy

Reviewed by: Designated Safeguarding Lead

Sept 2025

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Contents:

1. Purpose and aims
2. Roles and responsibilities
3. Safeguarding referrals and communication
4. Application
5. Policy Review and Compliance
6. Prevent Strategy
7. Associated information and guidance

1. Purpose and Aims

Bath College has a statutory and moral duty to ensure it safeguards and promotes the welfare of all college users. This includes students/apprentices who study and work on courses away from the college premises with particular reference to young people and vulnerable adults receiving education and training at Bath College. This is in line with the procedures set out by Bath & North east Somerset Community Safety and Safeguarding Partnership, Working Together to Safeguard Children 2023 and Keeping Children Safe in Education by:

- Ensuring a safe environment where all users, particularly young people and vulnerable adults, can learn, thrive, and progress. This commitment extends to students and apprentices who study or work off-campus.

- Being dedicated to identifying users, especially children, young people, and vulnerable adults, who are at risk of harm and taking necessary actions to ensure their safety both within the College, at home, and in work-based settings, aiming for their best outcomes.
- Ensuring regular contact with children and young people within the organisation undergoes appropriate checks and training based on their role and responsibilities.
- Promoting a collective responsibility for safeguarding: all staff, Governors, volunteers, students, apprentices, employers, and stakeholders must actively contribute to the safety of children, young people, and vulnerable adults.
- All staff mentioned being confident in reporting any safeguarding concerns to the Safeguarding Team, assured that these will be addressed promptly, securely, and with the student's or apprentice's wellbeing as a priority. Bath College fosters a culture where all staff have a clear understanding of safeguarding and child protection, including identifying, responding to, and reporting abuse and neglect in all forms, as well as managing allegations against professionals.

Special Educational Needs and Disabilities (SEND) & Related Safeguarding

The college follows the statutory definition of Special Educational Needs and Disabilities (SEND) in the Children and Families Act 2014: a young person has SEND if they have a learning difficulty or disability requiring special educational provision.

We recognise that learners with a disability may be more vulnerable to harm, including discriminatory abuse, harassment, ill-treatment, or denial of rights based on disability, race, gender, religion, or other protected characteristics.

Staff must remain alert to these risks and take immediate safeguarding action if discriminatory abuse is suspected.

Where a student is living in a private fostering arrangement (cared for by someone who is not a parent or close relative for 28 days or more), staff must notify the Designated Safeguarding Lead (DSL), who will inform the Local Authority in line with statutory guidance.

Bath College recognises the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.

Bath college recognises the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children

Bath College recognises the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Bath College recognises the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include communication barriers and difficulties in managing or reporting these challenges, including cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

The College is committed to ensuring the safety and wellbeing of all students, staff, governors, parents and carers in the digital environment. Online engagement is an essential part of education and daily life, but it brings with it a range of safeguarding risks that must be proactively addressed.

All College staff must report safeguarding concerns via the CPOMS system as outlined in the associated safeguarding procedures. External parties can make referrals by emailing safe@bathcollege.ac.uk or by calling/texting 07815491988 or 07966980534. Welfare Officers, under the direction of the Deputy DSL, promptly address these referrals during normal College hours.

In line with updated national guidance, the College recognises the following as significant online safeguarding harms under the “content” risk category:

- **Misinformation** – false or misleading information shared without harmful intent.
- **Disinformation** – deliberately false information, including fake news, shared with the intent to deceive.
- **Conspiracy Theories** – narratives that undermine trust in institutions or promote harmful ideologies.

These risks are addressed through a comprehensive personal development curriculum, including digital safeguarding. This includes awareness training, curriculum integration, and regular updates via safeguarding briefings.

The College uses Smoothwall to ensure robust filtering and monitoring of online activity. In accordance with the Department for Education's guidance:

- **“Generative AI: product safety expectations”** – any AI tools used within the College are assessed for safety, appropriateness, and compliance with filtering and monitoring standards.

All staff receive safeguarding training that includes online safety risks and how to identify and report concerns. Professional conduct online is governed by the College's IT Acceptable Use Policy, which outlines expectations for both personal and organisational representation.

Online safety activities are informed by the Online Safety Act 2023 and are detailed further in the College's standalone Online Safety Policy.

The College provides a safe, inclusive, and respectful environment where all users can learn and operate. This environment prioritizes their safety, respects their wishes and feelings, and promotes positive wellbeing. Our goal is to cultivate students, apprentices, and staff who are confident, healthy, safe, emotionally resilient, and personally fulfilled. A significant focus is on minimising harm to young people and vulnerable adults, including addressing child-on-child abuse with the same seriousness as other forms of abuse or harassment. Bath college recognises that child-on-child abuse may be happening even if there are no reported cases. Staff are trained to act in the best interest of students and apprentices, maintaining an attitude focused on any potential risks being assessed seriously and immediately.

Bath College recognises that it is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

Bath College has a designated Link Governor with lead responsibility for safeguarding to ensure governance guidance regarding this key function of the college.

As an integral part of the local community, Bath College maintains strong relationships with external agencies to manage and reduce conflict, and to foster respect and tolerance among diverse groups. We aim to promote fundamental British values and prepare students and apprentices for life in modern Britain, encouraging them to interact and learn from people of different backgrounds.

Bath College also ensures that any work placement or work-based learning environment for students and apprentices is safe, with risks minimised or eliminated.

This policy and its associated procedures apply to all staff, students, apprentices, and other users of Bath College, including volunteers, external contractors, remote students, and employers involved in student/apprentice work placements. Throughout this policy, the term 'College users' refers to all students and apprentices, with particular emphasis on safeguarding duties for young people under 18 years of age and vulnerable adults.

Abuse of Trust

All staff must understand that inappropriate behavior towards children, young people, or vulnerable adults is unacceptable. Under the Sexual Offences Act 2003, it is a criminal offense for anyone in a position of trust (e.g., teacher, youth worker) to engage in a sexual relationship with a child or young person (under 18) or with a vulnerable adult, even if the relationship is consensual. This applies when the child, young person, or vulnerable adult is in full-time education, and the individual in a position of trust works at the same establishment, regardless of whether they directly teach or interact with the person.

Children and young people

Bath College and the Governing Body recognises the following summary statements as definitions of abuse in terms of Child Protection (from 'Keeping Children Safe in Education'):

Abuse: a form of maltreatment of a child, which can occur through inflicting harm or failing to prevent harm. Harm includes both physical and non-physical ill-treatment, as well as the impact of witnessing the ill-treatment of others. This is particularly relevant in cases of domestic abuse and its effects on children. Abuse can occur in family, institutional, or community settings, perpetrated by individuals known to the child or, less commonly, by strangers. It can happen entirely online or be facilitated by technology for offline abuse. Children may be abused by adults or by other children.

Physical abuse: a form of abuse involving actions such as hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise inflicting physical harm on a child. It can also occur when a parent or carer fabricates or deliberately induces illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child, causing severe and adverse effects on their emotional development. It can involve making a child feel worthless, unloved, inadequate, or valued only for meeting someone else's needs. This abuse may include denying the child opportunities to express their views, deliberately silencing them, or mocking what they say or how they communicate. It can also involve imposing age or developmentally inappropriate expectations, such as interactions beyond the child's capability,

overprotection, limiting exploration and learning, or preventing normal social interaction. Emotional abuse may include witnessing or hearing the ill-treatment of another person, serious bullying (including cyberbullying), causing the child to feel frequently frightened or in danger, or exploiting or corrupting the child. Emotional abuse is present in all forms of child maltreatment and can also occur on its own.

Sexual abuse: involves forcing or enticing a child or young person to participate in sexual activities, which may or may not involve violence, and the child may be unaware of what is happening. These activities can include physical contact, such as penetration (e.g., rape or oral sex) or non-penetrative acts like masturbation, kissing, rubbing, and touching outside of clothing. They can also involve non-contact actions, such as making children look at or produce sexual images, watch sexual activities, encouraging inappropriate sexual behavior, or grooming a child for future abuse. Sexual abuse can occur online, with technology facilitating offline abuse as well. Perpetrators are not limited to adult males; women and other children can also commit sexual abuse. Abuse of children by other children is a specific safeguarding concern in education, and all staff should be aware of their school or college's policies and procedures for addressing it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely resulting in serious impairment of the child's health or development. Neglect can begin during pregnancy, such as from maternal substance abuse. After birth, it may involve a parent's or carer's failure to provide adequate food, clothing, and shelter (including exclusion from home or abandonment), to protect the child from physical and emotional harm or danger, to ensure adequate supervision (including using inappropriate caregivers), or to provide access to appropriate medical care or treatment. Neglect can also involve failing to respond to a child's basic emotional needs.

Specific Safeguarding Issues: There are further specific safeguarding issues that have become critical in safeguarding in relation to children and young people, and staff should be aware that behaviours linked to drug taking, alcohol and drug misuse put young people in danger. Issues can also manifest themselves via child-on-child abuse which may include bullying, cyberbullying, gender-based violence/sexual assaults, and youth produced sexual imagery (known more commonly amongst children and young people as nudes and semi-nudes. Listed below are some of the issues that staff should be aware of in terms of safeguarding risk:

- Children involved in court proceedings
- Children absent from education/absent from home or care
- Children with family members in prison
- Child Sexual Exploitation (CSE)
- Child criminal exploitation (CCE), e.g., county lines

- Domestic abuse
- Homelessness
- So called 'honour based' violence (HBV)
- Female Genital Mutilation (FGM)
- Forced Marriage
- Being involved in gangs
- Sexual violence and sexual harassment between children in schools and colleges
- Child-on-child abuse
- Upskirting
- Hate crime
- Mental ill-health
- Private Fostering*
- Radicalisation
- Relationship abuse
- Sharing nudes and semi-nudes**
- Trafficking.

Children and Young People Absent from Education

In line with *Keeping Children Safe in Education (KCSIE) 2025*, any learner under 18 who is absent for 10 consecutive college days or who shows a pattern of irregular attendance (e.g., repeated unexplained absences totalling 10 days within a half-term) must be reported immediately.

- Teaching and support staff must record all concerns on CPOMS and alert the Designated Safeguarding Lead (DSL).

- The DSL (or deputy) will assess risk, make contact with the learner and parent/carer where appropriate, and submit a Children Missing Education (CME) referral to the Local Authority Welfare/Education Team without delay.

*A 'Privately Fostered' child is a child under the age of 16 (18 if disabled) who is cared for and accommodated by someone other than a parent or close relative (i.e., step-parents, grandparents, brothers/sisters, or aunts/uncles) for more than 28 days. **'Making, possessing, and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18'. (Sharing nudes and semi-nudes: advice for education settings working with children and young people) (UK Council for Internet Safety)

Screening and Confiscation

Staff are trained to understand their duty to report all instances of youth-produced sexual imagery immediately as a safeguarding concern and to avoid consciously viewing, copying, sharing, or printing the imagery. The seizing and confiscation of devices must follow appropriate guidance regarding consent and/or actions by authorized personnel.

In line with the DfE Searching, Screening and Confiscation Advice (2023), staff have the right to search learners and confiscate prohibited items to maintain a safe learning environment. Any searches must be conducted lawfully, respectfully, and proportionately, with another member of staff present where possible. Confiscated items must be recorded, securely stored, and returned or disposed of according to guidance. Staff must report any safeguarding concerns identified during screening to the Designated Safeguarding Lead (DSL) immediately.

Adults: The Department of Health Care Act Statutory Guidance states that safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

The statutory guidance sets out 6 principles which apply to all sectors and settings, including further education colleges, and should inform how college staff work with adults:

1. Empowerment.
2. Prevention.
3. Proportionality.
4. Protection.
5. Partnership.
6. Accountability.

The College and the Governing Body recognises the following summary statements as definitions of abuse in terms of vulnerable adults:

Physical abuse including assault: hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.

Domestic violence: including psychological, physical, sexual, financial, emotional abuse, and so called 'honour' based violence.

Sexual abuse: including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, sexual assault, and sexual acts to which the adult has not consented or was pressured into consenting.

Psychological abuse including: emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, and unreasonable and unjustified withdrawal of services or supportive networks.

Financial or Material abuse including: theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements including in connection with wills, property, inheritance or financial transactions, and the misuse or misappropriation of property, possessions, or benefits.

Modern slavery which encompasses: slavery, human trafficking, forced labour and domestic servitude, and traffickers and slave masters using whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.

Discriminatory abuse including: forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, or religion.

Organisational abuse including: neglect and poor care practice within an institution or specific care setting such as a hospital or care home for example, or in relation to care provided in one's own home. This may range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and Acts of Omission including: ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care, and support or educational services, and the withholding of the necessities of life, such as medication, adequate nutrition, and heating.

Self-Neglect: This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. Assessments should be made on a case-by-case basis to inform whether a response is required under safeguarding, which will depend on the adult's ability to protect themselves by controlling their own behaviour, and whether they are unable to do this without external support

The College acknowledges that the types of abuse, neglect, and specific safeguarding issues outlined in this section reflect statutory safeguarding duties concerning children and vulnerable adults. However, these examples may not be comprehensive. The College is dedicated to safeguarding all students and apprentices in any situation where their welfare and/or safety is at risk.

2. Roles and Responsibilities

Link Safeguarding Governor

The Link Governor is responsible for liaising with the College Senior Leadership Team to ensure that:

- The College has procedures and policies which are consistent with the Local Safeguarding Children Board procedures.
- The Corporation reviews and agrees the College policy on safeguarding, including child protection, prevent and online safety each year.
- Termly updates following each Safeguarding Committee meeting are provided to Corporation, including an overview of how staff have complied with the policy including, but not limited to, the completion of staff training.
- Challenging managers on issues relating to safeguarding.
- Overseeing the liaison between agencies such as the Police and Social Care, as defined by the Local Safeguarding Children's Partnership, in connection with allegations against the Principal or the nominated senior staff member. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries

Designated and Deputy Safeguarding Leads

Designated safeguarding lead

Responsibility for strategic activity supporting the Link Safeguarding Governor to achieve the actions set out above, and for directly supporting the Deputy Designated Safeguarding Lead to achieve the actions set out below, including monitoring of implementation, supporting development, and implementation of organisational safeguarding arrangements

Deputy Designated safeguarding lead

Responsibility for first response to operational safeguarding concerns through a dedicated team of Welfare Officers.

The Designated and Deputy Safeguarding Leads (DSL and DDSL) will carry out their roles in accordance with Keeping Children Safe in Education

- Overseeing the referral of cases of suspected abuse or other allegations to relevant agencies.
- Providing advice and support to other staff on issues relating to child protection and safeguarding.
- Maintaining a formal record of any child protection referral, allegation, disclosure, or concern (even where that concern does not lead to an external referral), including a chronology of actions and interventions.
- Ensuring that relevant and up-to-date safeguarding information is available for all students, apprentices, parents, carers, employers, and other stakeholders via the College website.
- Liaising with the relevant Local Authority, Police and Prevent teams along with other appropriate agencies and professionals.
- Liaising with secondary schools where students are making the transition into College provision, for appropriate transition information to be shared and any required support arrangements are established.
- Supporting colleagues to liaise with employers and training organisations that receive young people from the College on placements, to ensure that appropriate safeguards are put in place.
- Ongoing development and delivery of mandatory safeguarding training to include child protection, risks associated with Radicalisation and Extremism, along with other specific safeguarding issues. This includes guidance on how to report concerns in line with the Bath College Safeguarding Policy and Procedures

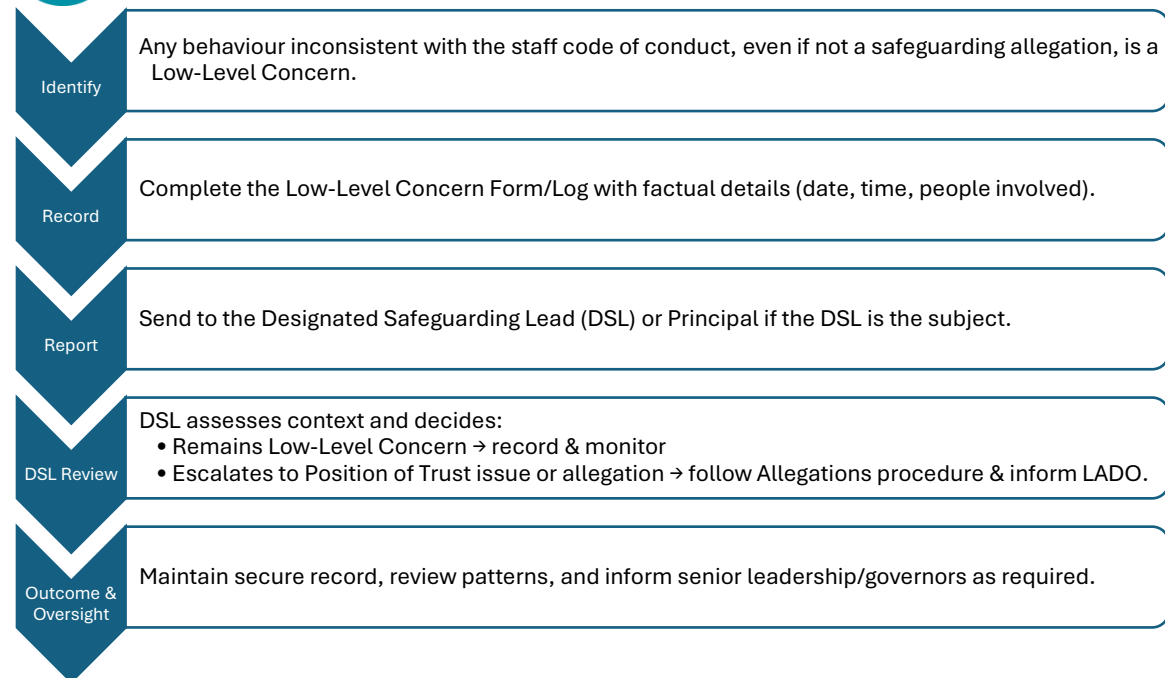
Low-Level Concerns and Position of Trust

In line with *Keeping Children Safe in Education (KCSIE) 2025*, any behaviour by staff, volunteers, contractors, or visitors that falls short of professional expectations, even if it does not meet the threshold of a safeguarding allegation, must be treated as a Low-Level Concern.

All such concerns, particularly where they relate to an individual in a Position of Trust, must be recorded, reported to the Designated Safeguarding Lead (DSL), and reviewed using the Low-Level Concerns Flowchart to ensure appropriate action and oversight.

Bath College recognise the importance of sharing low-level concerns, to create and embed a culture of openness, trust and transparency in which the college's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

Low-Level Concerns Flowchart



3. Safeguarding referrals and communication

The policy and procedures are approved by the College Corporation, which has designated a Link Safeguarding Governor. This governor represents the Corporation on the College Safeguarding Committee, providing support and challenge to College management, and delivering termly safeguarding updates to the Corporation.

These policies and procedures are communicated to all staff through various channels including staff induction, the staff intranet, safeguarding briefings, meetings, and a variety of training sessions throughout the year.

The College has a strategic Designated Safeguarding Lead (DSL) responsible for policy, training, and the strategic management of safeguarding arrangements, supported by a Deputy DSL who leads a team of Welfare Officers to handle day-to-day reporting and provide direct safeguarding interventions as needed.

The Curriculum and Quality Committee discuss and monitor safeguarding referrals, practices, and areas for development, with Safeguarding and Prevent a standing item on each agenda.

The DSL and Deputy DSL complete the annual Banes Council Safeguarding Audit and the annual Prevent Duty Risk Assessment and Audit to ensure practices remain current with legislation, guidelines, and local risk profiles. Appropriate

action plans are developed, and progress is monitored by the Safeguarding Committee.

Identification cards with lanyards are provided to staff and students/apprentices. The mandatory wearing of lanyards is embedded within the staff and student codes of conduct.

College prospectuses and job advertisements include a clear statement emphasising the College's commitment to safeguarding, and Safer Recruitment practices are overseen by the People and Culture management team, which also delivers Safer Recruitment training to managers.

Safeguarding information, literature, and awareness resources are disseminated to staff, students/apprentices, and other stakeholders through various means, including the College website.

Students/apprentices receive education on safeguarding, including online safety and child-on-child sexual abuse and harassment, through induction and tutorial activities. They are also informed about the legal implications and risks associated with sharing inappropriate images via social media and online.

Employers are provided with relevant safeguarding and Prevent duty information at the point of sign-up, with regular discussions during work-based visits to help recognise, understand, and report risks. Employers are directed to the College's safeguarding policies and are expected to comply with these frameworks in relation to college apprentices, and learners engaging in work based learning opportunities.

The College Safeguarding Team maintains positive collaborative working relationships with external organisations, ensuring effective communication and appropriate information sharing to offer early support and minimize safeguarding risks to students/apprentices.

4. Application

All new employees of the College, including apprentices, will undergo an Enhanced Disclosure via the Disclosure and Barring Service (DBS) and will complete an annual DBS declaration thereafter. The People and Culture department will adhere to the Disclosure Code of Practice outlined in the Recruitment and Selection Policy and Procedures to ensure Safer Recruitment practices are adhered to.

During the formal induction process, all new staff will complete mandatory safeguarding and Prevent training to understand their roles and responsibilities

and become familiar with the relevant policies and procedures. This training will cover extremism, radicalisation, and recognising concerning behaviors and ideologies, as well as the necessary safeguarding reporting procedures.

Safeguarding will be a regular agenda item in senior and college management and departmental team meetings to facilitate ongoing dialogue about related procedures, policies, and practices.

The Principal, Corporation, and all staff working with or on behalf of the College, including volunteers and external contractors in regular contact with students/apprentices, will receive information and training appropriate to their roles. This will help them understand safeguarding issues, outline their responsibilities, and equip them with the knowledge to report concerns in accordance with the College Safeguarding Policy. All staff will participate in annual refresher training appropriate to their roles, informed by updates to the Keeping Children Safe in Education statutory guidance, and recorded and monitored through relevant College systems.

The College collaborates with local education providers following Local Authority guidance on the transfer of Child Protection and Safeguarding records, ensuring a smooth and safe transition for students/apprentices with safeguarding needs. This is achieved by following the DfE guidance, and as detailed in the Keeping Children Safe in Education statutory guidance to ensure the safe and timely transfer of learner files between institutions.

The College will review and adhere to NSPCC guidelines on the retention and storage of child protection records. Timeframes are detailed in the Retention of Records Policy.

The Head of Governance will monitor the training of Governors and the College Safeguarding Governor, ensuring they receive appropriate safeguarding and child protection (including online) training. This training, updated annually at a minimum, will equip them with the knowledge to provide strategic oversight and assurance that the College's safeguarding policies and procedures are effective and support a robust whole-college approach to safeguarding.

When arranging learning in the workplace for young people, the employer is made fully aware of their duties in terms of safeguarding, and students/apprentices are given guidance prior to their work placement on keeping safe and how to access College safeguarding support if required whilst on placement.

Where school pupils are engaging in college activity, such as taster days, agreements are in place to report any safeguarding concerns back to their school in line with their existing safeguarding policies and procedures.

Acceptable Use Policies are in place across the organisation in relation to access to ICT, whereby internet usage will be proactively monitored to detect any material promoting terrorism, posing a risk of radicalisation, or posing other safeguarding risks. Risk categories are flagged in a timely manner to the DSL & DDSL via an automatically Smoothwall generated report, with appropriate action taken in line with the Safeguarding Procedures and, where appropriate, the Tackling Extremism and Radicalisation Policy and Procedures appendix

The Welfare Team will respond to any concerns related to a Support to Study process as per the College guidance, which provides a framework to assess and respond to any risks posed by a student or apprentice to their own or others health, safety, or wellbeing. This includes where a student or apprentice's health and wellbeing appears to be deteriorating and negatively impacted by their studies, where there is a risk of negatively affecting the teaching, learning and/or experience of others within the College community, or the day-to-day activities of the College, work placement or apprenticeship employer.

The DSL and DDSL are appropriately trained to respond to reported safeguarding and Child Protection concerns, and have a working knowledge of appropriate referral pathways including the Local Authority Social Care Teams, Early Help Teams, Prevent Teams, and the Channel Panel.

All staff, including Corporation members and volunteers, students/apprentices, and visitors should display their official College photo ID on the relevant colored lanyard at all times, in order for students/apprentices and visitors to feel safe and be able to recognise appropriate professionals that can offer support on behalf of the College. All staff have a duty to challenge non-compliance in order that unauthorised people on site can be identified and dealt with accordingly

All students/apprentices who self-declare a criminal conviction or have a positive disclosure on a DBS check made in preparation for work placement will receive a support interview to discuss the implications on their future learning. If deemed necessary, in relation to this type of disclosure or any other type of risk posed by a student/apprentice, a risk assessment panel is convened to make recommendations regarding their admission to/continuation with the College in any learning context, or suitability for work placement. Additional risk assessment meetings are convened involving Health and Safety, Security, the DSL and deputy, and other relevant staff as required, if a serious safeguarding issue or concern arises.

5. Policy Review and Compliance

This policy and its procedures are reviewed annually by the Designated Safeguarding Lead (DSL) in accordance with the Keeping Children Safe in Education statutory guidance. The policy is then approved by the College Safeguarding Committee and the College Corporation.

An annual audit of safeguarding provision, including the Local Authority Safeguarding Audit, is conducted. Additionally, the Government's Prevent Duty self-assessment tool for further education is incorporated into practice for strategic monitoring.

Termly reports are submitted to the Curriculum and Quality Committee, which includes the Senior Leadership Team (SLT) and the Link Safeguarding Governor. These reports review, analyse, and challenge safeguarding data and practices to ensure the College maintains a commitment to safeguarding, remains current with best practices, and complies with all requirements.

The College has an established process for auditing the Single Central Record, ensuring all required Disclosure and Barring Service (DBS) checks are completed and verified.

6. Prevent Strategy

Introduction and Context

Bath College is committed to providing a safe learning and working environments for all stakeholders. Section 26 of the Counterterrorism and Security Act 2015 places a duty on certain bodies (including educational institutions) in the exercise of their functions to have 'due regard to the need to prevent people from being drawn into terrorism'. This duty is known as the Prevent duty.

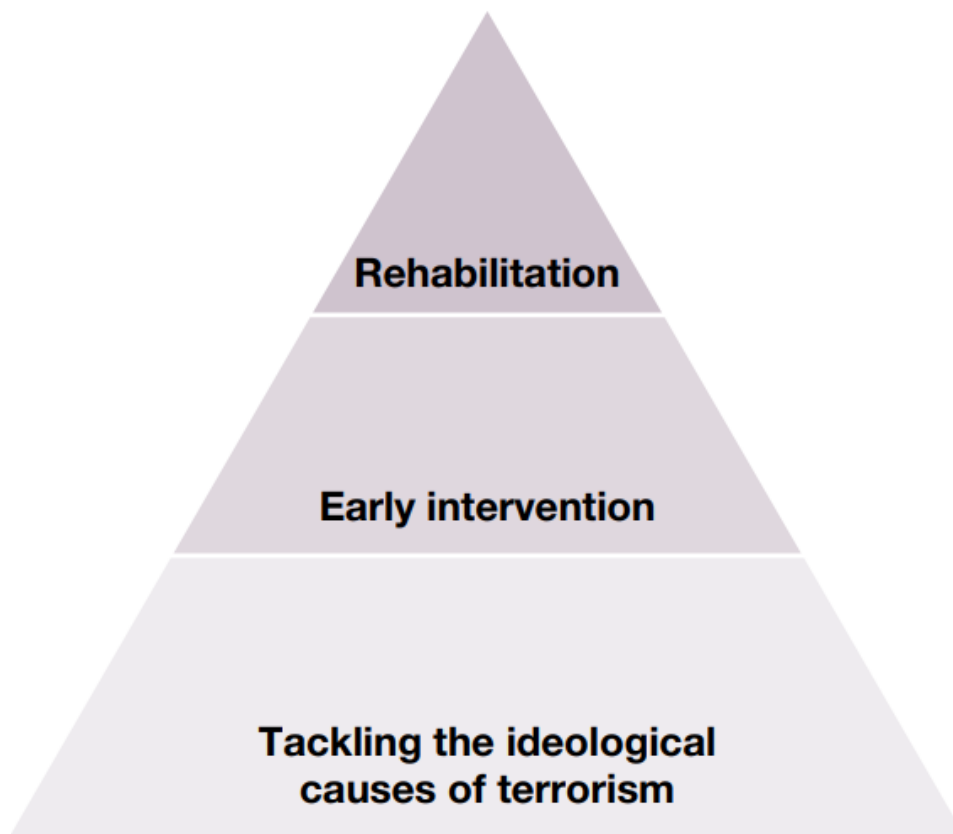
The Prevent Duty Guidance, published by the Government, is part of a government counterterrorism strategy to develop a robust counter terrorism programme – CONTEST.

CONTEST has four elements – Pursue, Protect, Prepare and Prevent. Prevent aims to reduce the threat to the UK from terrorists by stopping people becoming terrorists or supporting terrorism.¹

The strategy has three core strategic objectives:

- Tackle the ideological causes of terrorism
- Intervene early to support people susceptible to radicalisation.
- Enable people who have already engaged in terrorism to disengage and rehabilitate.

The delivery model (below) sets out how we tackle the ideological causes that lead to radicalisation, intervene early to support those who are susceptible to radicalisation, and rehabilitate those who have already engaged with terrorism.



The UK faces a range of terrorist threats. These include all forms of dangerous extremism which can be defined in the Prevent strategy as *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs"*.

To tackle the ideological causes of terrorism, Prevent focuses on reducing the influence of radicalisers on susceptible audiences, as well as reducing the availability of, and access to, terrorist content.

Terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them. However, many different factors make someone vulnerable and susceptible to radicalisation. These are not limited to but can include: identity, personal crisis, loss/bereavement, drug/alcohol abuse, isolation, mental health, internet, grievances, ideology, peer pressure, islamophobia, media, hate crime and a lack of theological knowledge

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical: an attack is expected imminently.
- Severe: an attack is highly likely.
- Substantial: an attack is a strong possibility.
- Moderate: an attack is possible but not likely.
- Low: an attack is unlikely.

Further Education colleges are major education and training providers for the 16 to 25-year age group, particularly young people from ethnically diverse, and socially and economically disadvantaged areas. Education, like other key sectors, has a responsibility to promote values of openness, tolerance and facilitating free debate which is central to being a British citizen. Colleges have a part to play in fostering shared values and promoting cohesion. Colleges should focus on the risks of non-violent ideologies which have been known to link directly to terrorism alongside violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within colleges and other training settings.

This strategy has the following objectives:

1. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the student voice.
2. To break down segregation among different student communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society.
3. To ensure student safety both physically and online and that the College is free from bullying, harassment, and discrimination.

4. To provide support for students who may be at risk or posing an active threat and appropriate sources of advice and guidance.
5. To ensure that students and staff are aware of their roles and responsibilities in preventing violent extremism, recognising current practice which contributes to the Prevent agenda.
6. Identify areas for improvement through risk assessment and develop a coordinated action plan.

To achieve these objectives, the strategy will concentrate on four areas:

Leadership and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all students, staff and visitors and promotes respect, equality and diversity and understanding.

This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation and referencing these as Fundamental British Values.
- Building staff and student understanding of the issues and confidence to deal with them through regular training sessions.
- Convene a 'Prevent Board' to oversee progress on measures to be undertaken by college that are identified in the action plan.
- Deepening engagement with local communities to include faith-based communities.
- Actively working with local schools, local authorities, police, and other agencies.

Teaching and Learning

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of students, by undermining extremist ideology and its causes through-supporting the student voice.

This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing, and community cohesion through regular tutorials, personal development curriculum delivery, student events and social media campaigns.

- Promoting wider skill development such as social and emotional aspects of learning.
- A curriculum adapted to recognise local needs, challenge extremist narratives, extremist ideologies and its causes and promote universal rights.
- Encouraging active citizenship/participation and student voice.
- Using the external speakers risk assessment process to evaluate the impact of any external speakers invited into college.
- Ensuring online policies are up to date with regularly reviewed filtering software.
- Provide regular updates and training on risk assessment models.

Student Support

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families, and communities.

This will be achieved through:

- Establishing strong and effective student support services.
- Building a culture of support and intervention within the college community across all departments promoting Prevent as a fundamental part of Safeguarding.
- Listening to what is happening in the College and the community.
- Implementing anti-bullying strategies and challenging discriminatory behaviour.
- Zero-tolerance approach to bullying, and rejects excuses such as "banter," "just having a laugh," or "boys being boys," as this can lead to a culture of unacceptable behaviours and an unsafe environment for children
- Promoting strategies to ensure online safety for the whole college community utilising internet filtering software and its follow up procedure when an alert is triggered, tracking and monitoring.
- Helping students and staff know how to access support in college and or through community partners.
- Supporting at risk students through safeguarding and crime prevention processes.
- Providing prayer facilities and quiet spaces.
- Focussing on narrowing the attainment gap for all students.

Managing Risks and Responding to Events

To ensure that the College monitors risks and is ready to deal appropriately with issues which arise.

It will do this through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the College.
- Understanding and managing potential risks within the College and from external influences, to include an awareness of emerging non-violent extremist groups that have been known to be linked to terrorist groups.
- Responding appropriately to events in local, national, or international news that may impact on students and communities.
- Ensuring measures are in place to minimise the potential for acts of violent extremist within the College.
- Ensuring plans are in place to respond appropriately to a threat or incident within the College.
- Developing effective ICT security, ~~and~~ responsible user policies and internet filtering software.
- Providing as secure and safe an estate as possible with effective lock down procedures in the event of a terrorist attack.

These four areas are addressed and monitored via the 'Prevent Duty Self - Assessment Tool for FE Providers' and subsequent **Risk Assessment & Action Plan**. These includes judgements and actions in the following nine areas:

1. Leadership
2. Partnership
3. Training
4. Online Safety
5. Welfare and pastoral support
6. Speakers and events
7. Site security
8. Fundamental British values
9. Learner engagement

Progress on measures that are identified in the action plan to be undertaken by the college, is overseen and scrutinised by the 'Prevent Board'.

7. Associated information and guidance

Bath College Safeguarding Team	
Designated Safeguarding Lead	Emily Cottle
Deputy Designated Safeguarding Lead	Alex Worrell-Dixon
Welfare Officer	Naomi Ogborne
Welfare Officer	Kiziah Wells-Pearce
Welfare Officer	Daner Qadar
Welfare Administrator	Amy Rowe

B&NES Council

Role	Name	Contact Details
Head of Service Children's Quality Assurance and Safeguarding	Sarah Hogan	01225 395218
Local Authority Designated Officer (LADO)	Victoria Harlin	01225 396890 LADO@bathnes.gov.uk
Director of Education & Safeguarding	Chris Wilford	01225 477109
Director of Children's Services & Education	Jean Kelly	01225394930
Assistant Director Children & Young People	Phoebe Holland	01225396907
Head of Service - Care Outcomes	Jo Parker	01225396957
Head of Service – Safeguarding Outcomes	Sam MacDonald	01225396860
Team Manager Triage Team	Ellis Woodley	01225 395076 ChildCare_Duty@bathnes.gov.uk CDC: 01225 396111
Virtual School Headteacher	Sarah Gunner	01225 477395

Safeguarding Referral Process

Staff member has a concern about a learners welfare

Is the learner at risk of immediate harm?

Yes

Telephone, Teams or visit a Safeguarding officer CCC or SVC. If you cannot get through contact the DSL/DDSL.

Then

No

Fill in a Safeguarding Incident form on CPOMS.

Send any updates or queries to safe@bathcollege.ac.uk

This MUST be done immediately.

Members of the Safeguarding Team

Emily Cottle
DSL

Alex Worrell-Dixon
DSL & DDSL

Safeguarding Lead will decide whether the learner needs the help of other services and will log actions on CPOMS register and update ProMonitor appropriately.

Safeguarding Lead will take the appropriate action and may refer back to the staff member for more information.

This policy is underpinned by associated legislation and guidance as listed below:

- Protection of Freedoms Act 2012

[Protection of Freedoms Act 2012 \(legislation.gov.uk\)](#)

- Safeguarding vulnerable groups act 2006

[Safeguarding Vulnerable Groups Act 2006 \(legislation.gov.uk\)](#)

- Disclosure and barring service

[Disclosure and Barring Service - GOV.UK \(www.gov.uk\)](#)

- Working together to safeguard children 2023

[Working together to safeguard children 2023: statutory guidance](#)

- Keeping children safe in education 2025

[Keeping children safe in education 2025](#)

- Equality act 2010

[Equality Act 2010 \(legislation.gov.uk\)](#)

- Information sharing advice for safeguarding practitioners

[Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](#)

- Prevent duty guidance

[Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#)

- Sexual offences act 2003

[Sexual Offences Act 2003 \(legislation.gov.uk\)](#)

- Online Safety Act 2023

[Online Safety Act 2023 \(legislation.gov.uk\)](#)

- BANES safeguarding

- Care and support statutory guidance

Care and support statutory guidance - GOV.UK

- Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024)

Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK

Update Detail	Reason	Date included in Policy:	Date of any protocol change before policy	Signed off by